

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

CIVIL ACTION No. 04-11492-REK

MARIO LACY,  
Plaintiff,

v.

WILLIAM J. FEENEY Jr., KENNETH  
HEARNS, JEAN MOSES ACLOQUE  
AND THE CITY OF BOSTON  
Defendants.

**DEFENDANTS WILLIAM J. FEENEY JR., KENNETH HEARNS, JEAN MOSES  
ACLOQUE, AND THE CITY OF BOSTON'S  
REQUESTED VOIR DIRE OF THE JURY**

The Defendants William J Feeney Jr, Kenneth Hearn, Moses Acloque and the City of Boston ("Defendants") hereby request that this Honorable Court conduct the following *voir dire* of the jury pool. If any juror answers these questions in the affirmative, the Defendants request that those jurors be individually questioned regarding their impartiality as jurors:

1. Is any juror employed by or has a close relation who is employed by the Boston Police Department?
2. Has any juror, spouse, or close relation ever filed suit against a police officer or police department?
3. Has any juror, spouse, or close relation ever filed suit against the City of Boston and/or Boston Police Department, and/or one of their employees?
4. Has any juror, spouse, or close relation ever been sued in a civil case by a government department or agency?
5. Would any juror be less likely to credit the testimony of a witness if that witness was a law enforcement officer?
6. Would any juror be influenced by media accounts of instances of police misconduct other than the allegations in this case?

7. Has any juror, spouse, close relation, and/or close friends ever had any negative experience in dealing with any law enforcement official in his or her official capacity?
8. Has any juror, spouse, close relation, and/or close friends ever been the subject of a law enforcement official's investigation?
9. Does any juror, spouse, or a close relation have a criminal record?
10. Does any juror harbor any ill feelings toward law enforcement as a profession?
11. Does any juror, spouse, close relation, and/or close friend, belong to any civic, political or other organization that is concerned with civil rights or liberties reform?
12. Does anyone on the jury believe that he or she or members of his or her family, friends, or acquaintances have been unreasonably treated in any fashion by police officers?

Respectfully submitted,  
DEFENDANTS, WILLIAM J FEENEY Jr,  
KENNETH HEARNS, JEAN MOSES  
ACLOQUE AND THE CITY OF BOSTON  
By their attorneys:

/s/ Karen A. Glasgow

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April 12, 2006